

KEVIN G. HORBATIUK (KG-4977)  
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Attorneys for Defendant  
**CUNNINGHAM DUCT WORK s/h/i/a**  
**CUNNINGHAM DUCT CLEANING CO., INC.**  
26 Broadway - 28th Floor  
New York, New York 10004  
(212) 482-0001

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
**IN RE COMBINED WORLD TRADE CENTER  
AND LOWER MANHATTAN DISASTER SITE  
LITIGATION**

**21 MC 102 (AKH)**

-----x  
**SALVADOR MEDRANO and TRINIDAD  
MEDRANO,**

Plaintiffs,

**DOCKET NO:  
07 CV 4492**

-against-

**100 CHURCH, LLC, 55 WATER STREET  
CONDOMINIUM, AMBIENT GROUP, INC.,  
AMERICAN EXPRESS BANK, LTD., AMERICAN  
EXPRESS COMPANY, AMERICAN EXPRESS  
TRAVEL RELATED SERVICES COMPANY, INC.,  
BATTERY PARK CITY AUTHORITY, BFP TOWER  
C CO., LLC., BFP TOWER C MM LLC.,  
BLACKMON-MOORING STEAMATIC CATASTROPHE,  
INC., d/b/a BMS CAT, BROOKFIELD FINANCIAL  
PROPERTIES, INC., BROOKFIELD FINANCIAL  
PROPERTIES, L.P., BROOKFIELD PROPERTIES  
CORPORATION, BROOKFIELD PROPERTIES  
HOLDINGS, INC., CUNNINGHAM DUCT CLEANING  
CO., INC., GPS ENVIRONMENTAL CONSULTANTS, INC.,  
INDOOR AIR PROFESSIONALS, INC.,  
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,  
LAW ENGINEERING, P.C., LEHMAN  
BROTHERS, INC., LEHMAN COMMERCIAL  
PAPER, INC., MCCLIER CORPORATION,  
MERRILL LYNCH & CO., INC., NEW WATER  
STREET CORP., ONE WALL STREET HOLDINGS,  
LLC., ROYAL AND SUNALLIANCE INSURANCE**

**NOTICE OF  
ADOPTION OF  
ANSWER TO  
MASTER COMPLAINT**

**GROUP, PLC., THE BANK OF NEW YORK  
COMPANY, INC., TRAMMELL CROW  
COMPANY, TRAMMELL CROW  
COMPANY, TRAMMELLE CROW CORPORATE  
SERVICES, INC., TRC ENGINEERS, INC.,  
TUCKER ANTHONY, INC., WFP RETAIL CO.,  
G.P., CORP., WFP RETAIL CO., L.P., WFP  
TOWER A CO., WFP TOWE A CO., G.P.,  
CORP., WFP TOWER A CO., L.P., and ZAR  
REALTY MANAGEMENT CORP.,**

**Defendants.**

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**PLEASE TAKE NOTICE**, that defendant CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC. ("CUNNINGHAM"), by its attorneys, RUSSO, KEANE & TONER, LLP, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102(AKH).

**WHEREFORE**, the defendant, CUNNINGHAM demands judgment dismissing the above captioned caption action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated:       New York, New York  
                 January 11, 2008

Kevin G. Horbatiuk  
Kevin G. Horbatiuk (KGH4977)  
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RKT File No. 824.078

TO: CHRISTOPHER R. LaPOLA, ESQ.,  
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**CERTIFICATION OF SERVICE**

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 11th day of January, 2008.

CHRISTOPHER R. LaPOLA, ESQ.,  
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